

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, March 24, 2010 10:08 AM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Unocal GM 44-2, SESE Sec 2 T7S R96W, Garfield County, Form 2A (#400034399) Review

Scan No 2032998 CORRESPONDENCE 2A#400034399

From: Davis, Gregory [mailto:Gregory.Davis@Williams.com]
Sent: Monday, March 08, 2010 2:10 PM
To: Kubeczko, Dave
Subject: RE: Williams Production RMT, Unocal GM 44-2, SESE Sec 2 T7S R96W, Garfield County, Form 2A (#400034399) Review

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Sunday, March 07, 2010 12:52 PM
To: Davis, Gregory
Subject: Williams Production RMT, Unocal GM 44-2, SESE Sec 2 T7S R96W, Garfield County, Form 2A (#400034399) Review

Greg,

I have been reviewing the Unocal GM 44-2 **Form 2A** (#400034399). COGCC requests the following clarifications regarding the data Williams has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Facilities (Section 5):** Form 2A indicates there will be a flare at this location. Construction layout drawings (Plat #2) indicate that there will be a separate flare pit located east of the cuttings pit. This flare pit needs to be marked as a special purpose pit on the Form 2A and a Form 15 (Earthen Pit Report/Permit) must be submitted. I can make the change if you send an email with this request. **Special Use Permit is OK. Form 15 will be filed.**
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 321 feet. Form 2A also indicates the depth to groundwater to be 45 feet bgs for a well located 1034 feet from the proposed well. COGCC's review indicates there is a water well (Permit No. 47306-Sneider, domestic well) located approximately 1002 feet to east, with a total depth of 60 feet bgs, a depth to groundwater of 45 feet bgs, and a pumping rate of 12 gpm. I believe this is the water well you located. COGCC's review found another water well (Permit No. 47731-Lindauer, domestic well) located 1316 feet to the southeast-east, with a total depth of 50 feet bgs, a depth to groundwater of 25 feet bgs, and a pumping rate of 15 gpm. This well is actually located west of Parachute Creek and is in hydraulic connection with the groundwater at the proposed well location. Based on the shallow depth to groundwater, as well as the permeable nature of the surface materials, COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) and/or with the potential for shallow groundwater (i.e., less than 20 feet bgs) a **sensitive area**. The following conditions of approval (COAs) will apply:
 - COA 4** - Location is in a sensitive area because of proximity to surface water; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. **Will comply.**
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids. **Best management practices submitted with the 2A cover this COA.**

COA 7 - Location is in a sensitive area because of the potential for shallow groundwater based on nearby wells and the highly permeable nature of the surface materials; therefore either a lined drilling pit or closed loop system must be implemented. **Closed Loop system has already been indicated on the Form 2A and Form 2's.**

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issue also needs to be addressed. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
Phone: (970) 625-2497x5
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



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